



COMMONWEALTH OF MASSACHUSETTS
Department of Telecommunications and Cable
1000 Washington Street, Suite 600, Boston, MA 02118
(617) 305-3580
www.mass.gov/dtc

D.T.C. 22-3

March 22, 2023

South Hadley Electric Light Department Petition for Designation as an Eligible
Telecommunications Carrier

**FIRST SET OF INFORMATION REQUESTS BY THE
DEPARTMENT OF TELECOMMUNICATIONS AND CABLE
TO SOUTH HADLEY ELECTRIC LIGHT DEPARTMENT**

Pursuant to 207 C.M.R. § 1.06(6)(c), the Department of Telecommunications and Cable (“Department”) submits to the South Hadley Electric Light Department (“SHELD”) the following information requests:

Instructions

The following instructions apply to this set of information requests, and all subsequent requests issued by the Department in this proceeding.

1. All answers should be filed with the Department by the close of business on **April 5, 2023**.
2. Unless otherwise stated, each request should be answered in writing and include: the case docket number; a reference to the request number; the name of the person responsible for the answer; and a recitation of the request.
3. The term “SHELD” means South Hadley Electric Light Department.
4. The term “Petition” means SHELD’s latest amended petition for Limited Designation as an Eligible Telecommunications Carrier that the Department received on January 12, 2023.
5. The term “provide complete and detailed documentation” means: provide all data, assumptions and calculations relied upon. Provide the source of and basis for all data and assumptions employed. Include all studies, reports and planning documents from which data, estimates or assumptions were drawn and support for how the data or assumptions SHELD used in developing the projections or estimates.

6. The term “ETC” means eligible telecommunications carrier.
7. The term “document” is used in its broadest sense and includes, without limitation, writings, drawings, graphs, charts, photographs, phono-records, microfilm, microfiche, computer printouts, correspondence, press releases, handwritten and/or typed notes, records, reports, bills, checks, articles from journals and/or other sources, legal filings, e-mails, SMS text messages, blog postings, RSS feeds, web pages, social media postings such as Facebook and Twitter, and/or other data compilations from which information can be obtained and all copies of such documents that bear notations or other markings that differentiate such copies from the original.
8. Requests shall be deemed continuing so as to require further supplemental responses if SHELD and/or its witnesses receive or generate additional information within the scope of these requests between the time of the original response and the close of the record in this proceeding.
9. If any of these requests are ambiguous, notify the Hearing Officer so that the request may be clarified prior to the preparation of a written response.

Requests

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| D.T.C. 1-1 | Please confirm that SHELD is petitioning only for designation as a low-income ETC and is not pursuing high-cost designation at this time. |
| D.T.C. 1-2 | Please identify what services SHELD currently provides in each of these three communities: a) South Hadley b) Shutesbury, and c) Leverett. |
| D.T.C. 1-3 | Please identify whether SHELD, if approved in this proceeding, plans to convert any of its existing landline customers to Lifeline services. |
| D.T.C. 1-4 | Please elaborate on SHELD’s Network Operations Center (NOC), referenced on pages 7-8 of the Petition. Please specifically address how the NOC monitors the network and equipment and the process of how the NOC alerts internal and external contacts in the event of an emergency. |
| D.T.C. 1-5 | Please refer to the Petition at page 19. Please explain what is meant by the statement, “SHELD currently provides Lifeline services in two towns.” |